

IN THE UNITED STATES DISTRICT COURT
OF THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

SUNTRUST MORTGAGE, INC.,
a Virginia Corporation

Plaintiff,

V.

LCMG, INC.
a South Carolina Corporation

Defendant.

Civil Action No.: 3:11-cv-565-JRS

MOTION FOR ENTRY OF DEFAULT

COMES NOW Plaintiff, SunTrust Mortgage, Inc. (“SunTrust”), and files this Request for Entry of Default (“Request”), pursuant to Federal Rule of Civil Procedure 55(a). In support of the Request, SunTrust states the following:

1. On August 26, 2011, SunTrust filed a Complaint in this Court against LCMG, Inc. d/b/a Mortgage Makers (“Mortgage Makers”). (D.E. 1).
2. On August 26, 2011, the Court issued a Summons on the Complaint. (D.E. 2).
3. On September 16, 2011, the Court entered SunTrust’s Certificate of Compliance, indicating that Mortgage Makers had been deemed served as of September 13, 2011. (D.E. 3).
4. On October 10, 2011, counsel for SunTrust agreed to allow Mortgage Makers until November 1, 2011 to secure local counsel and file an answer before SunTrust would seek entry of default and default judgment against Mortgage Makers.
5. As of November 4, 2011, Mortgage Makers has not filed any responsive pleading in this case.

6. The above statements are supported by the affidavit of Steven P. Gould, attached hereto as Exhibit 1.

7. Accordingly, SunTrust requests that the Clerk of the Court enter default against Mortgage Makers, pursuant to Federal Rule of Civil Procedure 55(a), which states:

When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party's default.

Fed. R. Civ. P. 55(a).

8. It is clear from this Court's Docket Report for this case that Mortgage Makers has failed to file a timely response to the Complaint and, thus, the Clerk of this Court must enter default against it.

Prayer for Relief

WHEREFORE, SunTrust Mortgage, Inc. requests that this Clerk enter a Notice of Default against LCMG, Inc.

SUNTRUST MORTGAGE, INC.

By /s/ Steven P. Gould
Robert D. Perrow (VSB No. 14766)
J.P. McGuire Boyd, Jr. (VSB No. 72753)
Steven P. Gould (VSB No. 80411)
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Counsel for Plaintiff SunTrust Mortgage, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on the 4th day of November, 2011, I will electronically file the foregoing Motion for Entry of Default with the Clerk of Court using the CM/ECF system and cause a true copy of the filing to be mailed to the following:

LCMG, Inc.
c/o Stewart M. Bledsoe, Registered Agent
147 Whisper Wood Drive
Lexington, South Carolina 29072

/s/ Steven P. Gould

Of Counsel